

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

FILED
RICHARD W. NAGEL
CLERK OF COURT
3/3/23

United States of America

v.

Brandon T. Holland

Case No.

3:23-mj-77

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
WEST. DIV. DAYTON

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 02/15/2023 in the county of Montgomery in the
Southern District of Ohio, the defendant(s) violated:

Code Section
18 U.S.C. §§ 922(g)(1) & 924(a)(8)

Offense Description
Possession of a Firearm by a Prohibited Person.

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.


Complainant's signature

Patrick Craun, FBI TFO, SOSSTF
Printed name and title

By reliable electronic means (telephone)
Sworn to before me and signed in my presence.

Date: March 3, 2023

City and state: Dayton, OH


Caroline H. Gentry
United States Magistrate Judge



AFFIDAVIT

I, Patrick Craun, a Task Force Officer (“TFO”) for both the Federal Bureau of Investigation (“FBI”) and Trotwood Police Department (“TPD”), being duly sworn, depose as follows:

INTRODUCTION


1. I have been employed as a law enforcement officer for the past seventeen (17) years. I currently serve as a detective with the Trotwood Police Department (“TPD”). I am presently a TFO with the FBI Southern Ohio Safe Streets Task Force (“SOSSTF” or “Task Force”).
2. I am trained to conduct investigations into drug trafficking and have participated in numerous investigations that have led to successful prosecutions. These investigations involved surveillance, gathering evidence of money laundering, interviewing suspected drug traffickers, and supervising the activities of informants who provided information and assistance that resulted in the seizure of narcotics, firearms, and United States currency. Based on my training and experience, I am familiar with federal drug and firearm laws, and I am aware that possession of a firearm by a convicted felon is a violation of Title 18, United States Code, §§ 922(g)(1) and 924(a)(8).
3. This affidavit is submitted in support of a criminal complaint and seeks issuance of an arrest warrant against Brandon Tavion Holland (hereinafter “**HOLLAND**”) for violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(8): being a felon in possession of a firearm.
4. The facts contained in this affidavit are submitted for the express purpose of establishing probable cause to secure an arrest warrant for **HOLLAND**. This affidavit does not include every fact known to law enforcement relevant to the subject investigation.
5. The facts in this affidavit come from my review of records and evidence, my training and experience, and information I have received from other law enforcement officers. I have not distinguished between information of which I have direct and indirect knowledge.

FACTS

6. On or about February 15, 2023, law enforcement observed a white Chevy Malibu with dark window tint traveling northbound on Gettysburg Avenue in Montgomery County, Southern District of Ohio, at a high rate of speed. Law enforcement observed the vehicle run a red light and pass multiple cars. Officers attempted to initiate a traffic stop; the Malibu slowed but did not come to a stop and fled. Law enforcement pursued the Malibu to the Summit Square apartments.
7. The Malibu’s occupant(s) fled on foot through the apartment complex. The subject, later identified as **HOLLAND**, was banging on the door at 853 Summit Square Drive, attempting to enter the apartment. **HOLLAND** was taken into custody.
8. Holland had two cell phones on his person and a black semi- automatic style pistol in his right front pocket. **HOLLAND** was placed in the back of a Trotwood Police Department cruiser and advised of his *Miranda* rights. **HOLLAND** elected to speak with law enforcement; he admitted to being the driver of the Malibu, fleeing from law enforcement, and possessing the firearm. **HOLLAND** acknowledged he knew he was not supposed to be in possession of a firearm as a convicted felon but was willing to take the risk to protect himself.
9. **HOLLAND** possessed a Taurus G2C, 9mm caliber semi-automatic handgun, serial number: TL093011. The Taurus handgun was loaded with eight (8) 9mm bullets in the magazine. Officers also located an extended magazine for a Taurus handgun loaded with twenty-one (21) rounds on

the north side of the Summit Square apartment building.

10. On February 20, 2023, Trotwood Police Department conducted an operability test of the Taurus G2C handgun. It was deemed operable.
11. Special Agent ("SA") Christopher Reed of the Bureau of Alcohol, Tobacco, Firearms, and Explosives, who specializes in identifying firearms and their origin/place of manufacture, has advised your Affiant that Taurus handguns are manufactured outside the state of Ohio; as such, the Taurus handgun **HOLLAND** possessed moved in interstate commerce.
12. Your Affiant conducted a criminal records check on **HOLLAND**. **HOLLAND** has a prior felony conviction (punishable by greater than one year of imprisonment):
 - a. on or about January 9, 2013, in Montgomery County, Ohio Common Pleas Court, case number 2012CR03123, three counts of (F1) "Aggravated Robbery (Deadly Weapon)."
13. Based on the facts set forth in this Affidavit, there is probable cause to believe that, on or about February 15, 2023, in the Southern District of Ohio, **HOLLAND** committed a violation of Title 18, U.S.C. §§ 922(g)(1) and 924(a)(8), being a felon in possession of a firearm. As such, your Affiant respectfully requests an arrest warrant be issued for **HOLLAND**.


Patrick Craun, Task Force Officer
Federal Bureau of Investigation
Southern Ohio Safe Streets Task Force

Subscribed and sworn to before me this 3rd day of March, 2023.
By reliable electronic means (telephone)


Caroline H. Gentry
United States Magistrate Judge

